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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SAGE HUMPHRIES, GINA MENICHINO,
ROSEMARIE DeANGELO, DANIELLE
GUTIERREZ, JANE DOE 100, JULIET
DOHERTY, and JANE DOE 200,

Plaintiffs,

vs.

MITCHELL TAYLOR BUTTON and
DUSTY BUTTON,

Defendants.

Case No.: 2:21-cv-01412-ART-EJY

**JOINT STIPULATION TO EXTEND
DISCOVERY DEADLINES AND
~~[PROPOSED]~~ AMENDED
SCHEDULING ORDER**

FIRST REQUESTED EXTENSION

1 Plaintiffs Sage Humphries, Gina Menichino, RoseMarie (“Rosie”) DeAngelo, Danielle
2 Gutierrez, Jane Doe 100, Juliet Doherty, and Jane Doe 200 (together, “Plaintiffs”), Third-Party
3 Defendants Michael and Micah Humphries (together, the “Humphries”), and Defendants
4 Mitchell Taylor Button and Dusty Button (together, “Defendants”), jointly submit this
5 Stipulation and Proposed Amended Scheduling Order.

6 Under Fed. R. Civ. P. 26(f) and Local Rule 26-1, Plaintiffs and Defendants conducted a
7 discovery-planning conference on May 3, 2022, and submitted a proposed Discovery Plan and
8 Scheduling Order, which the Court so-ordered on May 17, 2022. ECF No. 46. Since that date,
9 the parties have exchanged Rule 26 disclosures, agreed upon a Protective Order and ESI
10 Protocol, served and responded to initial sets of requests for production, and served and
11 responded to initial sets of interrogatories and requests for admission. Plaintiffs have
12 additionally served 13 document subpoenas on third parties pursuant to Fed. R. Civ. P. 45. The
13 following discovery remains to be completed: party and non-party depositions, exchange of
14 additional documents responsive to the parties’ requests for production, production of
15 documents responsive to Plaintiffs’ third-party subpoenas, and expert discovery.

16 Good cause exists to extend the remaining discovery deadlines in this matter. There are
17 seven Plaintiffs in this matter, and Plaintiffs assert 53 causes of action against Defendants.
18 Defendants filed a motion to dismiss certain of Plaintiffs’ claims, which was fully briefed on
19 April 4, 2022, and remains pending. ECF No. 38. Further, since the parties submitted their
20 proposed Discovery Plan and Scheduling Order, on July 8, 2022, Defendants filed a Third-Party
21 Complaint and Counterclaims, which raised counterclaims against each of the seven Plaintiffs
22 and joined five individuals as third-party defendants. ECF No. 54. Certain of those third-party
23 defendants have not yet been served or entered an appearance in this matter. On July 29, 2022,
24 Plaintiffs moved to dismiss the counterclaims against them, the Humphries moved to dismiss
25 the claims against them, and Plaintiffs moved to sever certain of the third-party claims from
26 Plaintiffs’ claims in this matter. ECF Nos. 61, 62. Those motions have not yet been fully
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briefed, and thus have not yet been resolved. Resolution of the pending motions in this matter may significantly narrow the scope of discovery.

Accordingly, Plaintiffs, Defendants, and the Humphries request that the Scheduling Order is amended as follows:

	Current Deadline	Proposed New Deadline
Expert Designations	September 1, 2022	November 21, 2022
Rebuttal Expert Designations	October 3, 2022	December 21, 2022
Discovery Cut-Off	October 31, 2022	January 27, 2023
Expert Discovery Cut-Off	November 2, 2022	January 31, 2023
Dispositive Motion Deadline	December 15, 2022	March 15, 2023
Joint Proposed Pre-Trial Order	30 days from ruling on dispositive motions or January 15, 2023 (if no dispositive motions)	30 days from ruling on dispositive motions or April 14, 2023 (if no dispositive motions)

This is Plaintiffs, Defendants, and the Humphries's first request for an extension of any discovery deadline.

IT IS SO ORDERED.


 UNITED STATES MAGISTRATE JUDGE

DATED: August 11, 2022

Dated: August 10, 2022

Respectfully Submitted,

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